

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	
JOSEPH B. RILEY, SR.	:	
TARA M. RILEY	:	CHAPTER 13
Debtor	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	CASE NO. 1-24-bk-02963
Movant	:	
	:	
JOSEPH B. RILEY, SR.	:	
TARA M. RILEY	:	
Respondent	:	

TRUSTEE'S OBJECTION TO DEBTOR'S EXEMPTIONS

AND NOW, this 27<sup>th</sup> day of February 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney, Douglas R. Roeder, Esq., and objects to the Debtor's exemptions for the following reason(s):

1. The Trustee objects pursuant to § 522(a)(3)(A). Debtor(s)' domicile was located for 180 days immediately preceding the 730-day period immediately preceding the date of the filing of the petition or for a longer portion of such 180-day period in Delaware.

WHEREFORE, Trustee requests that this Honorable Court to sustain the Trustee's Objection to Debtor's Exemptions.

Respectfully submitted,

/s/ Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717)566-6097

CERTIFICATE OF SERVICE

AND NOW, 27<sup>th</sup> day of February 2025, I hereby certify that I have served the within Objection by electronically notifying parties or depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

JOHN M HYAMS ESQUIRE  
2023 N 2ND STREET, SUITE 203  
HARRISBURG, PA 17102-

/s/Tammy Life  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee